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CLOSURE PLAN

FOR

WASTE WOOD BOILER INCINERATOR

PACIFIC WOOD TREATING CORP.

RIDGEFIELD, WASHINGTON

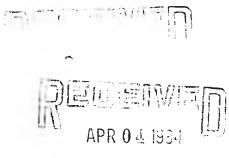
FEBRUARY 29, 1984



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TECHNICAL OPERATIONS SECTION

INTRODUCTION

This plan has been developed to be consistent with and meet the requirements of certain State of Washington Department of Ecology Regulations contained in WAC 173-303-610 (2) to (6) and U.S. Environmental Protection Agency Regulations contained in EPA 40-CFR 265, Subpart G, (265.110-265.120). This plan has been designed to eliminate incineration as a means of disposal of treating plant waste.

A copy of this Plan will be kept at Pacific Wood Treating Corporation office at 111 W. Division Street, Ridgefield, Washington until closure is completed and for a period of five years after closure is complete.

The actions described herein will be conducted by Pacific Wood Treating Corporation or its contractors, unless otherwise noted.

CLOSURE PLAN DESCRIPTION

Cease burning of bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use Creosote and/or Pentachlorophenol (K001), (CCA) Copper Chromated Arsenic waterborne treatment (D004) and boiler blow-down water (D002 corrosive, high Ph) as of January 8, 1983.

Disconnect and remove feed pumps and plumbing used to convey K001, D004, D002 waste to furnaces. Wood treated with Penta-CCA-Creosote will not be burned.

Divert waste sludge to new separation system for further recovery of treating chemicals before final separation of sludge for disposal at approved designated sites at either Arlington, Oregon or Mountain Home, Idaho.

Divert boiler blow-down water to holding tank for reduction of volume by evaporation. Resulting sludge to be drummed for transportation to approved site.

Decontaminate boiler plant burning and ash handling components as necessary.

Closure Plan to be implemented in following steps:

- A. Closure Procedure
- B. Schedule
- C. Certification

A. CLOSURE PROCEDURE

The following steps would be undertaken during closure.

- A1) SLUDGE FEED COMPONENTS Remove pumps and plumbing between 7000 gallon stainless steel
 tank and feed screws of furnace and cell of boiler plant.
 Cut pipe to short lengths and along with valves and pump,
 drum-up for disposal off site.
- A2) FEED SCREWS, FURNACE AND CELL FURNACE RAM CHARGER FEED MULTI-CONE PRE-HEATER ASH HANDLING EQUIPMENT Scrape, wipe down and collect residue for drum disposal off site.
- A3) BAG HOUSES Remove and replace bags. Wash down inside walls of bag houses.
 Old bags to be drummed for off-site disposal.
 Wash liquid to be collected for return to waste water system.
- A4) ASH STORAGE Ash generated from burning of K001, D004, D002 and treated waste wood to be shipped to Arlington, Oregon for disposal.

Original ash storage area cover to be removed to a depth of two (2) feet and replaced and disposed of off site. Area will be covered with concrete to allow ready access between hog fuel and conveyor. Storm water run-off control will be provided for this area.

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B. CLOSURE SCHEDULE

(By Reference Number of Closure Procedure, Page 5)

REFERENCE A1 -

To be completed within 90 days of approval of Closure Plan. Plumbing was disconnected when we ceased burning of waste sludge.

REFERENCE A2 and A3 -

All of the equipment listed has been cleaned as described in "Closure Procedure".

REFERENCE A4 -

Incineration of waste was stopped permanently on January 8, 1983.

Ash disposal at the RBT Site was completed prior to January 25, 1983 and, after that, contaminated ash was manifested and hauled to Arlington, Oregon by Chem-Security Systems. Inc., for disposal.

The soil cover of the original ash pile storage area has been removed to a depth of two (2) feet and replaced. A concrete bunker was built to hold accumulated ash before disposal.

We will proceed with installation of the concrete pad cover as soon as we receive approval of our Draft Closure Plan.

C. CERTIFICATION

Within 90 days after closure is complete, same will be certified to the Washington Department of Ecology as specified in WAC 173-303-610 (6) and EFA 40 CFR 265.115.

